

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA,

-against-

NOTICE OF MOTION
IND. NO.: 10-CR-0709 (GBD)

JAIME CASSUTO, et al.

Defendants.

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S I R S :

PLEASE TAKE NOTICE, that upon the annexed declaration of RICHARD A. REHBOCK, ESQ., dated the 15th day of November, 2011, the indictment filed herein and upon all prior proceedings heretofore held herein, the undersigned as attorney of record for the defendant, DAVID CASSUTO, will move this Court to be held in and for the United States District Court for the Southern of New York, before the Honorable George B. Daniels, USDJ, located at 500 Pearl Street, New York, New York on the 1st day of December, 2011 or as soon as counsel may be heard, for an Order granting the relief requested, as follows:

1. An Order permitting Defendant David Cassuto to join in the motions filed by his Co-Defendant Isaak Khafizov for a Bill Of particulars, Discovery and Disclosure of information specifically delineated in said application;
2. And such other and further relief as the Court may deem just and proper.

DATED: November 15, 2011

LAW OFFICE OF
RICHARD A. REHBOCK, ESQ.
Attorney for David Cassuto
One Maple Run Drive
Jericho, NY 11753
516 827-9583

By: Richard A. Rehbock RR-9908

To: United States Attorney
Southern District of New York

CERTIFICATE OF SERVICE

I, RICHARD A. REHBOCK, ESQ., hereby certify that I have this day caused a copy of the Notice of Motion and Affidavit attached hereto to be served upon the United States Attorney for the Southern District of New York by having a copy of same filed under ECF

DATED: November 15, 2011

Richard A. Rehbock

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

-against-

DECLARATION

IND. NO.: 10-CR-0709 (GBD)

JAIME CASSUTO, et al.

Defendants.

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STATE OF NEW YORK)
) SS.:
COUNTY OF NASSAU)

RICHARD A. REHBOCK, ESQ., hereby declares under the penalties of perjury:

1. That he is an attorney duly admitted to practice before this Court, and he is the attorney of record for the defendant DAVID CASSUTO, charged with various crimes pursuant to the above captioned indictment herein. Further, he is familiar with the facts and circumstances of the matter herein.

2. That this declaration is made in support of the application by Defendant DAVID CASSUTO to join in and in further support of the motions filed by co-defendant ISAAK KHAFIZOV and his counsel, James Kousouros for the various forms of relief more fully set forth in their respective Notice of Motion and Memorandum of Law, which were filed electronically with the Court.

3. The Motions filed by Co-Defendant Khafizov regard bills of particulars, discovery, release of information and evidence pursuant to Brady v. Maryland, 373 U.S. 83 (1963), and various other cases explaining and expanding same, which directly affect Defendant David Cassuto in his

preparation for trial in this matter. This declaration is made upon information and belief, the sources and grounds for said information and belief are the files maintained in the law office of Richard A. Rehbock, Esq. and the proceedings heretofore held herein.

4. Defendant David Cassuto joins in the motions made by Co-Defendant Isaak Khafizov, the various prayers for relief and adopts the arguments made in support of same.

5. Defendant David Cassuto respectfully requests that he be permitted to join in all of the motions filed by Co-Defendant Isaak Khafizov herein.

WHEREFORE, Counsel for Defendant David Cassuto respectfully requests that the Court grant the relief requested in the motions herein and the motions filed by Co-Defendant Isaak Khafizov as to him, and such other and further relief as the Court may deem just and proper.

DATED: November 15, 2011

Richard A. Rehbock RR-9908

Attorney for David Cassuto
1 Maple Run Drive
Jericho NY 11753
516 827-9583
E-Mail: rrehbock@msn.com